

Municipal Facilities Operation & Management:
2.1.4 Household Hazardous Waste Transfer Facility
& Load Check Activities

2.1.4.1 Introduction

Activities conducted at the Household Hazardous Waste Transfer Facility (HHW Transfer Facility) and by the Miramar Landfill Load Check Operations are the responsibility of the Environmental Services Department, Environmental Protection Division. One of the goals for both activities is to reduce the impact of hazardous materials being improperly disposed of to the municipal trash. The proper management and disposal that these activities provide for residential and commercial waste customers, directly protects storm water quality. These activities operate using best management practices, observations, and inspections of their work areas and facilities to provide storm water protection while carrying out their activities.

The HHW Transfer Facility provides San Diego city residents with a location for proper disposal of household hazardous waste (HHW) accumulated at their residence during the course of routine maintenance to their home, yard and/or vehicle. These collection activities include management of petroleum products (oils and lubricants), home maintenance products (paints, pesticides, fertilizers), and cleaning agents (solvents, soaps, spray cans) that could pollute the storm water system if allowed to enter it. Detailed information on the Household Hazardous Materials Program and outreach activities are located in that section of this document.

Load Check Operations provide inspection, investigation, and removal of hazardous materials found being disposed of by residential or commercial customers of the City of San Diego's Miramar Landfill. Unacceptable wastes that are typically found by the inspectors include oils, paints, solvents, pesticides, and/or corrosive chemicals. When these hazardous wastes are identified, staff attempts to determine the generator of the illegal wastes. If the generator is identified, that responsible party is contacted, educated on proper disposal, and directed to appropriate resources for proper disposal. If a generator is not identified, staff collects the wastes, packages and stores the wastes in a contained storage unit, and has a licensed hazardous waste hauler properly dispose of those wastes.

The HHW Transfer Facility and Load Check Operations must meet the requirements of the San Diego Municipal Storm Water Permit, as described in Table 2.1.4-1.

Table 2.1.4-1. Permit Requirements—Miramar Landfill Transfer Facility & Load Check Activities.

Section	Requirement (Summary)	Permit Section
2.1.4.2	Implement pollution prevention methods	F.3.a.(1); F.3.b.(1)
2.1.4.2	Designate and implement minimum BMPs to protect water quality	F.3.a.(4); F.3.b.(4)
2.1.4.2	Inspect areas and activities annually	F.3.a.(7); F.3.b.(6)
2.1.4.2	Coordinate spill prevention, containment and response activities	F.5.f.
2.1.4.2	Implement and designate a minimum Educational Program requirement for all appropriate target communities	F.4.a. F.4.b. F.4.c.
2.1.4.3	Develop a budget for storm water expenditures for each fiscal year covered by the Municipal Permit	F.8
2.1.4.4	Document activities for Jurisdictional Urban Runoff Management Program Annual Report	I

This component's objectives are to:

- Develop and implement a storm water pollution prevention plan to designate, implement, and periodically update storm water practices at the HHW Transfer Facility and Load Check Operations to control the introduction of pollutants to storm water.
- Develop and implement storm water Best Management Practices (BMPs) to protect water quality.
- Develop and implement storm water Best Management Practices (BMPs) employee training program.
- Develop and implement storm water Best Management Practices (BMPs) public education program for workers and visitors at the HHW transfer facility.
- Conduct annual inspections.
- Continue to budget for and to implement the HHW Transfer Facility and Load Check activities through the five-year life of the Municipal Permit.
- Develop a system to document storm water pollution prevention activities conducted by HHW transfer facility and Load Check Operations staff, which will then be submitted, as required, to the Storm Water Pollution Prevention Program along with an annual activities report.

2.1.4.2 Activities

In order to effectively implement the development regulation changes, development review procedures, and education and training outlined below, the Environmental Services Department shall maintain a designated coordinator or coordinators to keep informed about the Municipal Permit so that he/she can provide guidance to department management and staff in implementing the this component of the Urban Runoff

Management Plan document. The name(s) of the coordinator shall be submitted to the Storm Water Program by Thursday, February 21, 2002—the Urban Runoff Management Program implementation date. The Environmental Services Department shall provide the names of new representatives whenever the designated coordinator is replaced. The Storm Water Program will interact with the coordinator(s) to provide the latest Municipal Permit information and to request annual compliance reports from the programs.

The Environmental Services Department will conduct the following activities, which are further described below:

Storm Water Pollution Prevention Plan

This facility is permitted under the General Industrial Storm Water Permit, Order No. 97-03 – DWQ. A general permit condition is to prepare a Storm Water Pollution Prevention Plan, retain it on site, and implement it. The purpose of the Storm Water Pollution Prevention Plan is to help identify the source of pollution that affect the quality of industrial storm water discharges and authorized non-storm water discharges and to describe and ensure the implementation of the Best Management Practices to reduce or prevent pollutants in industrial storm water discharges and authorized non-storm water discharges. The Storm Water Pollution Prevention Plan must be reviewed annually and revised as necessary to comply with all permit requirements.

Pollution Prevention

Environmental Services Department will implement storm water pollution prevention plans that include non-structural BMPs at the Miramar Landfill. These activities include observations, and inspections of the HHW Transfer Facility work areas to provide storm water protection while carrying out collection activities.

Best Management Practices

The following section provides a brief narrative of the activities occurring and the storm water Best Management Practices implemented for the HHW Transfer Facility and Load Check Operations to improve water quality.

A. HHW Transfer Facility Activities

- **Site Design:** The site is designed to prevent surface water from running on to the work area. Chemicals are stored in containers either within buildings or on spill containment pallets to prevent releases. The work area is covered to protect from inclement weather.
- **Traffic Flow:** The access road to the site was designed to provide one-way circulation through the drop-off area. The customer would drive into the

unloading area where trained staff would meet the vehicle and unload the HHW. Customers are required to stay in their vehicles during the unloading process. Once unloaded, each customer proceeds to the facility exit. If it were determined that a customer's waste is from a business, staff would issue the customer a Notice of Violation to document this situation. Some incidents may be referred to the County Department of Environmental Health or the City Attorney's Office for additional enforcement actions.

- **Unloading and Storage of Wastes:** The unloading operations take place on an asphalt surface area covered with plastic sheeting that is also underneath a covered area. Once the vehicle has stopped, staff unloads the HHW from the vehicle onto a cart while the driver remains in their vehicle. The loaded cart is wheeled to the work area underneath the canopy area where staff separates the HHW by category for packaging. After the packaging category is determined, the container is placed into suitable large-volume Department of Transportation (DOT) containers for temporary storage at the facility.
- **Waste Storage:** The HHW Transfer Facility includes three storage lockers with fire suppression systems and additional containment for control of leaks and spills. Additionally, certain DOT packaged wastes are required by the Fire Department to be stored outside of the storage lockers. These waste containers are placed on spill containment pallets. The containers and containment pallets are then covered with a tarp to add protection from the weather. The HHW Transfer Facility is secured with an eight-foot high fence and locking gates to control access to the site.
- **Inspections:** Detailed inspections of the HHW Transfer Facility occur at the end of each operational day to ensure proper management of all debris, trash and hazardous wastes. Other routine inspections of the facility include general housekeeping functions. If any spills or leaks are detected, staff records the actions taken to address the spill and clean up activities.
- **Waste Disposal:** Removal of the HHW collected at the site is dependent on the quantity of and types of waste generated. The HHW is typically transported from the site on a weekly basis by a licensed hazardous waste transporter to a Federal and State licensed treatment, storage, and disposal facilities.

B. Load Check Activities

- **Inspections of Waste Loads at the Landfill:** Load Check Operations staff collect hazardous waste found within the operational areas of the Miramar Landfill's commercial and public areas. For any hazardous wastes found, if a responsible party is not identified or is unable to properly assume responsibility for proper disposal, staff collects the wastes and places them in a properly packaged and

distinctively labeled container as required by federal and state requirements. The containers are then placed in a storage unit with a fire suppression system and additional containment for control of leaks and spills. The storage units are inspected daily to ensure that container integrity is maintained until time of disposal.

Containers of certain DOT packaged wastes are placed on spill containment pallets to hold any spills. The containers and containment pallets are then covered with a tarp to add protection from the weather. The wastes are then transported off site by a licensed hazardous waste transporter, and taken to Federal and State licensed treatment, storage, and disposal facilities. The hazardous waste storage area is inspected daily to ensure any debris, trash or hazardous wastes have been properly managed.

In some incidents where unacceptable waste has been disposed of at the landfill and the responsible party can be identified, staff issues a Notice of Violation to the responsible party. If the Notice of Violation is issued to a business, an administrative fee is also assessed. Some incidents may be referred to the County Department of Environmental Health or the City Attorney's Office for additional enforcement.

- **Facility Maintenance:** Preventative maintenance and routine inspections occur around the buildings, work areas, storage units and associated BMPs are instituted to protect the storm water drainage systems. During these inspections, storm drains and flow paths are checked for any evidence of blockage or pollution such as obstructions, debris, or discoloration. During these checks and during normal operations, staff is alert for any evidence of non-storm water discharges, so that the situation can be recorded and evaluated, and required corrective action is taken.
- **Fueling & Maintenance of Vehicles:** All fueling and maintenance of vehicles used by staff occurs at other City facilities designed for those activities.

Annual Inspections

Environmental Services Department will conduct annual inspections of the HHW Transfer Facility to verify compliance with the Urban Runoff Management Plan and provide a report to the Storm Water Pollution Prevention Program.

Education & Training

1. Internal/Municipal Education

The City of San Diego plans to conduct two levels of education and training for staff: General and Activity Specific. All staff will receive a basic introduction to the issue via a “General Storm Water” workshop created and provided to the City Departments by the General Services Storm Water Pollution Prevention Program. Additionally, those departments or work groups that perform work activities specifically identified in, and affected by, the Permit will create, execute and fund Activity Specific training sessions to introduce new work processes, functions and behaviors that incorporate the Best Management Practices necessary for staff to prevent illegal discharges into the City’s storm water collection and conveyance system and recreational waters.

A) General Storm Water Training Funded By the Storm Water Program:

The General Storm Water workshops, while created by the Storm Water Program, are primarily being given by trainers to the staff of their respective departments. And, Items 2 - 6, below, are the educational materials created for the workshops. A “Train the Trainer” workshop was also created and given by the Storm Water Program (Item 7) to familiarize the trainers on the material and subject matter prior to rolling out the General Training workshop to their department staff.

Table 2.1.4-2. Storm Water Program General Training City-Wide.

ITEM	AVAILABLE
1. Clean Water Leader/3-Cs BMP Reference Card	July 2001
2. General Storm Water Training Video	October 2001 To be completed by June 2002
3. City Employee Brochure	October 2001
4. Stop Pollution Pad	October 2001
5. Employee Knowledge & Behavior Survey. To be given before and after each General Storm Water Workshop by department trainers	October 2001
6. Frequently Asked Questions for Department Trainers	October 2001
7. Train the Trainer Sessions. Training of department trainers on content and materials for the General Storm Water Workshops	September 10-14, 2001
8. Storm Water Newsletter	July/August 2002*

** Note that Items 1 through 7 occurred in FY 2002 for citywide distribution, and that Item 8 is slated for Fiscal Year 2003 and reflects an estimated available date.*

B) Activity Specific Storm Water Best Management Practices Training(s):

The Environmental Services Department staff will work closely with the Storm Water Program to create training modules, which incorporate BMPs instituted for the HHW transfer facility and Load Check Operations. Environmental Services Department

supervisory staff will conduct the training annually and monitor staff's understanding of the BMP practices as part of the daily supervisory activities.

Table 2.1.4-3. Activity Specific Training.

ITEM	AVAILABLE*
1. Identify needs, create and execute Activity Specific trainings	Completed by February 2002
2. Create Storm Water BMP Reference Binders for Staff	Completed by February 2002
3. Update BMP Reference Binders –periodic	June 2003
4. Place Storm Water BMP Bulletin Boards in Employee Area(s)	June 2003
5. Train new employees on Storm Water activities. General and Activity Specific to be conducted by supervisor	New Employee Orientation
6. Demonstrate an applied knowledge of the classroom, or tailgate training session	Ongoing after February 2002 During daily operations

* Note the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

2. External Education:

Education will be extended to contracted staff that work Saturdays at the HHW Transfer Facility, and any vendors who perform work at the HHW Transfer Facility or Load Check Operations storage or office areas. The general public has no access to the Load Check Operations storage areas. Since members of the general public remain in their vehicles when utilizing the HHW Transfer Facility, the potential impact to the storm drain system is minimal.

Table 2.1.4-4. HHW Transfer Facility & Load Check External Education Activities.

ITEM	AVAILABLE *
1. All contracted staff working at the HHW transfer facility will receive an orientation training covering storm water protection and BMPs prior to initiating collection or transportation activities.	Currently available
2. All vendors performing work at the HHW transfer facility site will be informed about storm water protection and BMPs prior to starting work.	February 2002
3. All contracted staff packaging and disposing of hazardous wastes collected by Load Check Operations will receive an orientation training covering storm water protection and BMPs prior to initiating work.	Currently Available

ITEM	AVAILABLE *
4. The general public and businesses have access to the Environmental Services Department's web site which provides information on pollution prevention methods.	Currently Available
5. The general public receives education and outreach regarding storm water protection issues at the HHW transfer facility via the HHW Program. See HHW Program Section.	Currently Available

** Note the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.*

2.1.4.3 Phasing

The City has implemented its HHW Transfer Facility and Load Check Operations as part of the National Pollution Discharge Elimination System (NPDES) permits issued to the City's landfills. The HHW Transfer Facility also meets requirements for the NPDES permit issued to the Point Loma Wastewater Treatment Plant, and the Storm Water permit. These permits along with permits to conduct HHW collection services have required the implementation of storm water related activities. Training of appropriate staff has been performed, and Best Management Practices (BMPs) are implemented in compliance with these permits. Activities conducted by the HHW Transfer Facility and Load Check Operations are reviewed annually to ensure that the operational and storm water protection goals and requirements are met. Operational and procedural changes are made as necessary. No additional activities are anticipated at this time.

2.1.4.4 Annual Assessment

The following form is representative of the quantitative and qualitative measures that will be tracked by the Storm Water Program regarding the Household Hazardous Waste Transfer Facility & Load Check Activities component in order to prepare the Jurisdictional Urban Runoff Management Program annual assessment. *These assessment factors and questions are presented for information only; some questions may be modified prior to each annual assessment period, and not all of the factors or questions below may apply to each component's responsible department(s).* Prior to each fiscal year, a tailored Annual Assessment Form will be distributed to responsible departments, and will include an Excel spreadsheet containing direct and indirect quantitative and qualitative measures similar to the example below. The Storm Water Program will provide a blank copy of the Annual Assessment Form and additional guidance to department management prior to the beginning of each fiscal year. Submission of this report will require department director approval.

Program Assessment Form - Municipal Facilities Operations and Management - Household Hazardous Waste Transfer Facility & Load Check Activities

QUANTITATIVE ASSESSMENT:

Activity	Quantity	Units	Comments
Number of high priority municipal facilities		#	
Number of high priority municipal facilities targeted for inspection		#	Due to calendar-year vs. fiscal year, staffing, budget, etc., as well as Permit Section F.3.b.(6)(d), the number of sites targeted for inspection may be less than the actual number of sites.
Number of high priority municipal facilities inspected		#	Number of sites (not the number of inspections, which may or may not be the same).
Number of medium and low priority municipal facilities inspected		#	See above.
Quantity of material removed from MS4		tons	direct measure; report in tons.
Quantity of debris removed that could have enter MS4 (i.e. street sweeping, litter removal)		tons	direct measure; report in tons.

QUALITATIVE ASSESSMENT:

1. Describe the major accomplishments of this component over the past year.

2. Summarize the educational and outreach activities conducted for this component over the past year to educate staff on water quality principles.

3. Summarize new activities or improvements to be implemented next year as a result of your self-assessment.

4. Other comments.

FINANCIAL ASSESSMENT:

Estimated annual storm water expenditures:

Personnel Expenditures: _____

Non-personnel Expenditures: _____